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September 13, 2012

Honorable Rebecca R. Pallmeyer
Everett McKinley Dirksen
United States Courthouse
Chambers 2178
219 South Dearborn Street
Chicago, IL 60604

Re: *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*
Master Docket Case No. 1:11-cv-05468

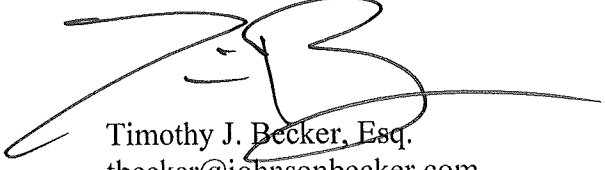
Dear Judge Pallmeyer:

On August 29, 2012 the Court entered a Minute Order instructing the Parties to notify the Court by today regarding the need for the proposed November 9, 2012 Status Conference. By way of review, the Parties alerted the Court at the August 29, 2012 Status Conference that they were working on certain issues related to the scope of search terms and electronic discovery. Throughout the past two weeks the Parties have regularly met and conferred regarding these issues. To date, the Parties have been unable to resolve all outstanding issues. However, we continue to meet and confer in an effort to either resolve or narrow the remaining issues. Given we continue to make progress, the Parties jointly request, that the deadline imposed in the August 29, 2012 Minute Order be extended to October 2, 2012. Specifically, the Parties propose they report to the Court at the October 2, 2012 Status Conference on the status of this dispute so as to advise the Court of: 1) the need for the November 9, 2012 motion practice date; and 2) the scope of the issues that remain in dispute.

As noted above, Mr. Bennett and I remain optimistic that additional time will allow us to further narrow the areas of dispute, and potentially resolve all issues in their entirety. Thank you in advance for the Court's consideration.

Sincerely,

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cc: Stephen Bennett, Esq. (Via Email & ECF)